

**NORTH CAROLINA DIVISION OF  
AIR QUALITY**

## Application Review

Issue Date: March ##, 2019

**Region:** Winston-Salem Regional Office  
**County:** Guilford  
**NC Facility ID:** 4100268  
**Inspector's Name:** Davis Murphy  
**Date of Last Inspection:** 07/11/2018  
**Compliance Code:** 3 / Compliance - inspection

<b>Facility Data</b>  <b>Applicant (Facility's Name):</b> Plantation Pipe Line Company  <b>Facility Address:</b> Plantation Pipe Line Company 6907-A West Market Street Greensboro, NC 27409  <b>SIC:</b> 4613 / Refined Petroleum Pipe Lines <b>NAICS:</b> 48691 / Pipeline Transportation of Refined Petroleum Products  <b>Facility Classification: Before:</b> Title V <b>After:</b> Title V <b>Fee Classification: Before:</b> Title V <b>After:</b> Title V				<b>Permit Applicability (this application only)</b>  <b>SIP:</b> 15A NCAC 02Q .0501(b)(2) <b>NSPS:</b> NA <b>NESHAP:</b> NA <b>PSD:</b> NA <b>PSD Avoidance:</b> NA <b>NC Toxics:</b> NA <b>112(r):</b> NA <b>Other:</b> NA			
<b>Contact Data</b>				<b>Application Data</b>			
<b>Facility Contact</b>  James Stamey Operations Manager (336) 547-3661 6907-A West Market Street Greensboro, NC 27409	<b>Authorized Contact</b>  Ken Brinegar Director of Operations (770) 751-4142 1000 Windward Concourse, Suite 450 Alpharetta, GA 30005	<b>Technical Contact</b>  Johnny Tapia Senior EHS Specialist (704) 249-9936 502 Tom Sadler Road Charlotte, NC 28214	<b>Application Number:</b> 4100268.18B <b>Date Received:</b> 09/17/2018 <b>Application Type:</b> Modification <b>Application Schedule:</b> TV-Sign-501(b)(2) Part II <b>Existing Permit Data</b> <b>Existing Permit Number:</b> 03980/T13 <b>Existing Permit Issue Date:</b> 11/27/2018 <b>Existing Permit Expiration Date:</b> 10/31/2021				
<b>Total Actual emissions in TONS/YEAR:</b>							
CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2017	0.0100	0.1700	163.58	0.0400	0.0100	5.63	1.17 [Toluene]
2016	0.0100	0.1800	176.73	0.0400	0.0100	5.86	1.21 [Toluene]
2015	0.0100	0.1300	213.36	0.0300	0.0100	6.90	1.45 [Toluene]
2014	---	---	207.26	---	---	6.74	1.42 [Toluene]
2013	---	---	290.49	---	---	9.27	1.94 [Toluene]
<b>Review Engineer:</b> Richard Simpson  <b>Review Engineer's Signature:</b>				<b>Comments / Recommendations:</b> <b>Issue:</b> 03980/T14 <b>Permit Issue Date:</b> March XX, 2019 <b>Permit Expiration Date:</b> October 31, 2021			

## I. Purpose of Application

Plantation Pipe Line Company currently holds Title V Permit No. 0398T13 with an expiration date of October 31, 2021 for a breakout for gasoline and distillates located in Greensboro, Guilford County, North Carolina. The primary purpose of this application is for 15A NCAC 02Q .0501(b)(2) Part II significant modification. The modification application was received on September 17, 2018. All terms and conditions of the existing permit shall remain in effect until the second step significant permit modification has been issued or denied.

## II. Facility Description

The facility is a breakout station for the Plantation Pipe Line Company. Gasoline and distillate lines enter the site through two pipelines, one measuring 26" and the other 14" in diameter. Products are pumped into a tank farm at this site, and reintroduced into outgoing pipelines. One pipe measuring 14" and the other 8" in diameter send the product further down the pipeline or nearby to bulk gasoline terminals. After being stored on-site, the material can be pumped to bulk terminals where it can be shipped via tank trucks. The tanks that exclusively store distillate, kerosene, or transmix do not have any applicable requirements in the permit but are still listed. A variety of exempt tanks are on site and are used to store petroleum/water mixtures prior to processing.

## III. History/Background/Application Chronology

**September 17, 2018** – Permit application **4100268.18A** was received for a Title V Step 1 modification.

**September 17, 2018** – Permit application **4100268.18B** was received for a Title V Step 2 modification.

**November 27, 2018** – Permit 03980T13 was signed and submitted to the facility.

**February 8, 2019** – The facility and Winston-Salem Regional Office were requested by the Permitting Section to comment on the modification. Comments were received and included in the permit.

**February 8, 2019** – The TVEE was approved by DAQ's Jenny Shepard.

**March ##, 2019** – Permit 03980T14 was signed and submitted to the facility.

## IV. Permit Modifications/Changes and ESM Discussion

The following table describes the modifications to the current permit as part of the modification process.

Page No.	Section	Description of Changes
Cover and throughout	Throughout	Updated all tables, dates, and permit revision numbers.

There were no changes made to the Title V Equipment Editor (TVEE) under this permit modification.

## V. Regulatory Review

The facility is currently subject to the following regulations:

15A NCAC 2D .0524, New Source Performance Standards (40 CFR 60, Subpart K)  
15A NCAC 2D .0524, New Source Performance Standards (40 CFR 60, Subpart Kb)  
15A NCAC 02D .0524, New Source Performance Standards (40 CFR 60, Subpart IIII)  
15A NCAC 2D .0925, Petroleum Liquid Storage in Fixed Roof Tanks  
15A NCAC 2D .0927, Bulk Gasoline Terminals  
15A NCAC 2D .0933, Petroleum Liquid Storage in External Floating Roof Tanks  
15A NCAC 2D .1111, Maximum Achievable Control Technology (40 CFR 63, Subpart R)  
15A NCAC 2D .1111, Maximum Achievable Control Technology (40 CFR 63, Subpart ZZZZ)  
15A NCAC 2D .1806, Control and Prohibition of Odorous Emissions  
15A NCAC 02Q .0504, Option for Obtaining Construction and Operation Permit  
15A NCAC 02Q .0317, “Avoidance Conditions” (for 15A NCAC 2D .0530, Prevention of Significant Deterioration)

An extensive review for each applicable regulation is not included in this document. The previous permit modification for new tank (ID No. GN178) is subject to three regulations that were not on the previous permit 03980T12. The additional regulations are 40 CFR 60, Subpart Kb, 15A NCAC 02Q .0504, and 15A NCAC 02Q .0317, “Avoidance Conditions” (for 15A NCAC 2D .0530, Prevention of Significant Deterioration). The facility’s status with respect to all other regulations has not changed. For a discussion of MACT, CAM, and PSD requirements, see Section VI. The permit will be updated to reflect the most current stipulations for all applicable regulations.

## VI. NSPS, NESHAPS/MACT, PSD, 112(r), CAM

**NSPS** – The Permittee is currently subject to the New Source Performance Standards for three of its existing storage tanks (**ID Nos. GN153 through GN155**). Based on NSPS 40 CFR 60 Subpart K, the Permittee is required to equip these tanks with an internal floating type cover per 40 CFR 112(a) as well as the monitoring and recordkeeping activities per 40 CFR 60.113. This permit modification does not affect this status.

### *40 CFR Part 60, Subpart Kb*

The facility is subject to Subpart Kb “Standards of Performance for Volatile Organic Liquid Storage Vessels” due to the new above ground internal floating roof gasoline/distillate/ethanol storage tank (7,333,368 gallon capacity) with tank rim seal system (ID Nos. GN178). Based on NSPS 40 CFR 60 Kb, the Permittee is required to equip these tanks with an internal floating type cover per 40 CFR 112b(a)(1) as well as the monitoring and recordkeeping activities per 40 CFR 60.115b and 40 CFR 60.116b

### *40 CFR Part 60, Subpart IIII*

The 224 hp Clarke-John Deere diesel-fired pump (ID Nos. I-GN-Gas Farm) is subject to the notification, testing, recordkeeping, and reporting requirements of NSPS for Stationary Compression Ignition Internal Combustion Engines, 40 CFR 60, Subpart IIII.

**NESHAPS/MACT/112j** – The Permittee is currently subject to the Maximum Achievable Control Technology Standards 40 CFR 63 Subpart R for its existing storage tanks in gasoline service. The permit currently includes references to the requirements in each of the paragraphs of this Subpart.

## 1. 15A NCAC 2D .1111: MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY

### *MACT Subpart R*

- a. Plantation Pipe Line Company is “an existing” affected source. The pump station operations at this facility shall comply with all requirements of 15A NCAC 2D .1111 “Maximum Achievable Control Technology” and 40 CFR Part 63 Subpart R “National Emission Standards for Gasoline Distribution Facilities.”
- b. For the purpose of this permit condition, the definitions and nomenclature contained in 40 CFR 63.421 shall apply.
- c. The Permittee shall comply with the requirements of 40 CFR 63, Subpart A “General Provisions,” in accordance to the applicability of Subpart A to such sources, as identified in Table 1 of 40 CFR 63, Subpart R.

### *MACT Subpart ZZZZ*

The diesel-fired emergency fire pump generators (ID No. I-GN Fuel Farm and I-GN Gas Farm) are subject to the “NESHAP for Stationary Reciprocating Internal Combustion Engines, 40 CFR Part 63,” MACT Subpart ZZZZ. The engines are considered a new source under the MACT because they were constructed after June 12, 2006. Per 40 CFR 63.590(c)(4), a compression stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions complies with MACT Subpart ZZZZ by meeting the requirements for NSPS Subpart JJJJ. No further requirements apply for such engines under MACT Subpart ZZZZ.

**PSD** – The facility is currently classified as a PSD major facility for VOC emissions because potential emissions are greater than 250 tpy. Due to this modification, the Permittee will be subject to the Prevention of Significant Deterioration significance levels (40 tpy for VOCs). A PSD avoidance permit condition (15A NCAC 02Q .0317, Avoidance Conditions for 15A NCAC 2D .0530, Prevention of Significant Deterioration) will be placed into the permit for this modification. VOC emissions from the new above ground internal floating roof storage tank (7,333,368 gallon capacity) with tank rim seal system (ID No. GN178) and associated equipment shall be less than 40 tons per consecutive 12-month period. The combined quantity of gasoline/distillate/ethanol products passing through the tank and associated equipment shall be less than 535,335,864 gallons per 12-month period. Potential VOC emissions calculations were performed using a worst-case assumption of only gasoline (at 535,335,864 gallons per consecutive 12-month period). The annual VOC emissions from the modification was calculated at 23.2 tons per year, well below the limit of 40 tons per year.

Guilford County has triggered increment tracking under PSD for PM<sub>10</sub> and SO<sub>2</sub>. However, this permit modification does not consume or expand increments for PM<sub>10</sub> and SO<sub>2</sub>.

**112(r)** – The facility is not subject to Section 112(r) of the Clean Air Act requirements because it does not store any of the regulated substances in quantities above the thresholds in the Rule. This permit modification does not affect this status.

**CAM** – 40 CFR 64 requires that a compliance assurance monitoring plan be developed for all equipment located at a major facility, that have pre-controlled emissions above the major source threshold and use a control device to meet an applicable standard. There are no permitted control devices at this facility; therefore, CAM is not applicable.

## VII. Facility Wide Air Toxics

The Permittee is not currently subject to any NC Air Toxics requirements. This permit modification does not affect this status.

## **VIII. Facility Emissions Review**

There will be an increase of VOC emissions from this modification and a PSD avoidance limit of less than 40 tons per consecutive 12-month period has been established. Actual emissions from previous years are listed on Page 1.

## **IX. Compliance Status**

DAQ has reviewed the compliance status of this facility. During the most recent inspection conducted on July 11, 2018, Davis Murphy of the WSRO indicated that the facility appeared to be in compliance with all applicable requirements.

### Five year compliance history

The facility has not been sent any Notice of Violations and Deficiency in the last five years.

## **X. Public Notice/EPA and Affected State(s) Review**

Pursuant to 15A NCAC 02Q .0501(b)(2), the facility completed the two-step significant modification process initiated by Application No. 1400268.18B and received on September 17, 2018. The completion of the second step modification does require a thirty-day public notice period and a forty-five day EPA review period. A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 02Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 02Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant shall be provided to the EPA. Also pursuant to 02Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice is provided to the public under 02Q .0521 above.

## **XI. Other Regulatory Considerations**

- A P.E. seal is NOT required for this application.
- A consistency determination from the Guilford County Planning and Development on October 15, 2018 was approved by J. Leslie Bell, Planning Development Director.
- An application fee was required and received for the modification.

## **XII. Recommendations**

The permit modification application for Plantation Pipe Line Company in Greensboro, Guilford County, North Carolina has been reviewed by DAQ to determine compliance with all procedures and requirements. DAQ has determined that this facility is complying or will achieve compliance, as specified in the permit, with all requirements that are applicable to the affected sources. The DAQ recommends the issuance of Air Permit No. 03980T14.